

EXHIBIT GG

In the Matter Of:

UNITED STATES vs STATE OF GEORGIA

1:16-CV-03088-ELR

LAKESHA STEVENSON

September 22, 2022



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1 A. I would have to sit and think about that. 10:02AM

2 Q. Okay. And I'm correct, I believe, that you 10:02AM
3 assumed this job in 20 -- October 2018. Does that sound 10:02AM
4 right? 10:02AM

5 A. Yes. 10:02AM

6 Q. Okay. Were you notified prior to October 2018 10:02AM
7 that you would be in this position? 10:02AM

8 A. No. 10:02AM

9 Q. Okay. 10:02AM

10 MS. TUCKER: I'd like the Court Reporter to 10:03AM
11 mark this document as Plaintiff's Exhibit 421. 10:03AM

12 (Plaintiff's Exhibit 421 marked for 10:03AM
13 identification.) 10:03AM

14 MS. TUCKER: Great. Thank you. 10:03AM

15 Q. BY MS. TUCKER: The Bates number on the first 10:03AM
16 page of this exhibit is GA00953298. 10:03AM

17 A. (Witness examining document.) 10:03AM

18 Q. This is an October 29th, 2019 e-mail from 10:03AM
19 Vickie Cleveland to you. The subject reads: 10:03AM
20 "Responsibilities." And there's one attachment. 10:03AM

21 Dr. Stevenson, do you recognize this e-mail 10:04AM
22 and attachment? 10:04AM

23 A. Yes. 10:04AM

24 Q. Okay. Let's turn to the attachment with -- at 10:04AM
25 the bottom. The Bates number reads GA00953299. The top 10:04AM

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1 of the document reads: "GNETS program specialist 10:04AM
2 responsibilities." And there's a box with bulleted 10:04AM
3 responsibilities. 10:04AM

4 Dr. Stevenson, did you create this 10:04AM
5 document? 10:04AM

6 A. I don't think so. 10:04AM

7 Q. Okay. Would you think that Vickie created it 10:04AM
8 since she sent it to you? 10:04AM

9 MS. JOHNSON: Objection. 10:05AM

10 THE WITNESS: I'm not sure. She -- she 10:05AM
11 sent it to me based on what this says, but I'm not sure 10:05AM
12 if she created it. 10:05AM

13 Q. BY MS. TUCKER: Okay. But you did receive this 10:05AM
14 from Vickie Cleveland? 10:05AM

15 A. That's what the e-mail says. 10:05AM

16 Q. And these are e-mails we received from the 10:05AM
17 State. 10:05AM

18 A. Okay. 10:05AM

19 Q. Okay. I'd love for you to take a look at the 10:05AM
20 document and responsibilities. And then would you agree 10:05AM
21 that it identifies your responsibilities as GNETS 10:05AM
22 program specialist? 10:05AM

23 A. Yes. 10:05AM

24 Q. Okay. It's quite a long list. I know you're 10:05AM
25 busy, but I'd like to go through them. Starting with 10:05AM

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1 the first bullet. "Provide consultation regarding
2 improvement on the GNETS strategic plan."

3 So you've mentioned the GNETS strategic
4 plan a few times. What is it?

5 A. It's a framework for the GNETS programs.

6 Q. Okay. All 24 regional programs?

7 A. Yes.

8 Q. Okay. In what ways do you provide consultation
9 regarding improvement on the GNETS strategic plan?

10 A. We always take a look at the strategic plan to
11 see what can be consolidated, if something is
12 repetitive, and just make changes as needed. If there
13 are any questions regarding any changes that were made
14 or when we do changes, if there's a training or a
15 presentation that needs to be completed, then I'll do
16 that.

17 Q. Okay. What type of changes would be made?

18 A. It just depends. We've made a few, so...

19 Q. Can you give me an example?

20 A. For example, we consolidated. It was seven
21 focused areas and we consolidated them into six, because
22 two of them had a lot of the same information.

23 Q. Okay. Got it. And do you also provide
24 consultation regarding improvement to the programs?

25 A. I don't provide consultation regarding

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1 improvement to the specific programs, no.

10:07AM

2 Q. Okay. And then do you see how this bullet --
3 there's a few that are somewhat highlighted.

10:07AM

10:07AM

4 A. Yes.

10:07AM

5 Q. Do you see that?

10:07AM

6 A. (Nodding yes.)

10:07AM

7 Q. Do you know why this bullet is highlighted?

10:07AM

8 A. I do not.

10:07AM

9 Q. Next bullet: "Complete GNETS end-of-year
10 reviews, provide ratings and feedback."

10:07AM

10:07AM

11 A. Yes.

10:07AM

12 Q. What are GNETS end-of-year reviews?

10:07AM

13 A. So the end-of-year reviews are the strategic
14 plan reviews.

10:07AM

10:07AM

15 Q. Okay. And this is for the original GNETS
16 programs?

10:07AM

10:07AM

17 A. Correct.

10:07AM

18 Q. Okay. Why is this bullet highlighted?

10:07AM

19 A. I have no idea.

10:07AM

20 Q. Okay. So how do you provide ratings?

10:07AM

21 A. Previously, we would go through each part of
22 the strategic plan, face-to-face with the GNETS -- each
23 of the GNETS directors, and they would provide evidence
24 of their ratings and then we would provide feedback.

10:07AM

10:08AM

10:08AM

10:08AM

25 Q. What basis did you --

10:08AM

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1	A. There was a rubric.	10:08AM
2	Q. There was a rubric. Okay. And is this how you	10:08AM
3	still -- you mentioned that this is not how you do it	10:08AM
4	anymore?	10:08AM
5	A. We no longer provide a specific rating.	10:08AM
6	Q. When did that change?	10:08AM
7	A. I would have to think about it honestly.	10:08AM
8	Q. Okay. Do you think it was in the last two	10:08AM
9	years?	10:08AM
10	A. It was before COVID.	10:08AM
11	Q. Before COVID. Okay. So 2020 and prior?	10:08AM
12	A. Somewhere around there.	10:08AM
13	Q. Okay.	10:08AM
14	A. 2019, maybe 2020.	10:08AM
15	Q. Okay. Do you have a rubric still?	10:08AM
16	A. It's still a rubric, yeah.	10:08AM
17	Q. Okay. So if they're not ratings, what are	10:08AM
18	you --	10:08AM
19	A. It's not a numerical rating.	10:08AM
20	Q. Okay.	10:08AM
21	A. It's operational evident, not evident.	10:09AM
22	Q. So still a score?	10:09AM
23	A. It's not necessarily a score, but...	10:09AM
24	Q. What would you describe them as?	10:09AM
25	A. If it was a number, I would say it was a score.	10:09AM

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1	Q. Sure.	10:09AM
2	A. We can say rating.	10:09AM
3	Q. Rating. Okay.	10:09AM
4	A. Yeah. Non-numerical.	10:09AM
5	Q. A non-numerical rating?	10:09AM
6	A. Yes.	10:09AM
7	Q. Is this done in conjunction with anyone else at	10:09AM
8	GaDOE?	10:09AM
9	A. No.	10:09AM
10	Q. So you work on these ratings alone?	10:09AM
11	A. Vickie, myself, the directors are there, but no	10:09AM
12	one outside of myself and Vickie from GaDOE.	10:09AM
13	Q. Okay. Does anyone else in GaDOE see the	10:09AM
14	ratings?	10:09AM
15	A. No.	10:09AM
16	Q. Okay. Does anyone else see the feedback?	10:09AM
17	A. No.	10:09AM
18	Q. Okay. Let's move on to the next bullet.	10:09AM
19	"Assist GNETS PM with strategic plan improvement	10:09AM
20	initiatives." And then in parenthesis it reads:	10:09AM
21	"Editing, testing changes in the portal, conduct	10:10AM
22	trainings, et cetera."	10:10AM
23	A. Yes.	10:10AM
24	Q. Okay. The GNETS PM is Vickie; is that correct?	10:10AM
25	A. Correct.	10:10AM

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1 Q. Okay. And are these between -- so the first
2 one, beginning with GA00946724 --

3 A. Mm-hmm.

4 Q. This is between RESA and GaDOE; is that
5 correct?

6 A. It's between RESA and the GNETS.

7 Q. RESA and the GNETS program. Okay. And then
8 the other one is the GA00946726. That's between the LEA
9 and --

10 A. The GNETS.

11 Q. The regional GNETS programs?

12 A. Yes.

13 Q. Do the regional GNETS programs sign any
14 assurances with GaDOE?

15 A. No.

16 Q. To receive their funding?

17 A. The assurances that are built into the Con
18 application.

19 Q. In the Con application?

20 A. Mm-hmm. The budget assurances.

21 Q. Are there separate assurances in the GNETS
22 grant application?

23 A. No.

24 Q. Okay. Do you have any role with regard to
25 these assurances?

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1 strategic plan, and your consultation with the regional
2 GNETS programs on the strategic plan.

3 A. Okay.

4 Q. What is the timeline of strategic review plan?
5 We just talked about the grant application timeline?
6 What is this timeline?

7 A. Well, we no longer review the strategic plan in
8 a way in which there is a timeline because we've made
9 changes. So the grant application and strategic plan
10 are now aligned. So the information that we would look
11 for in the strategic plan, they are attaching within the
12 grant application. So there is not a review as it was
13 in previous years. They do the end-of-year summary from
14 the strategic plan and the mid-year summary where they
15 rate themselves and make priorities for the different
16 areas, but we no longer go and sit and do reviews as in
17 the past.

18 Q. When did that happen?

19 A. This is 2022. It was either 2020 or 2021. I'm
20 not sure.

21 Q. So what is the strategic review plan? What
22 does it look like now, then?

23 A. It looks the same. It's still the framework.
24 It's still the framework for the program and the
25 framework for their programs. And it still has actions

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1 and things, but we're just not rating and reviewing the 12:41PM
2 strategic plan because now they're aligned -- it's 12:41PM
3 aligned with the GrantApp. So if you look at the grant 12:41PM
4 application and the strategic plan, you will see a lot 12:41PM
5 of the same information. 12:41PM

6 Q. But they still complete it in both places? 12:41PM

7 A. No, they no longer have to complete the grant 12:41PM
8 application in the portal. I mean, I'm sorry, the 12:41PM
9 strategic plan. They still have to complete the grant 12:41PM
10 application. 12:41PM

11 Q. Okay. So the strategic plan in 2020 or 2021 no 12:41PM
12 longer has to be completed? 12:42PM

13 A. In the portal. 12:42PM

14 Q. In the portal. 12:42PM

15 A. They still have to have their strategic plan 12:42PM
16 information as a part of the framework for their 12:42PM
17 programs available, but we no longer require it to be 12:42PM
18 upload -- uploaded in the portal. 12:42PM

19 Q. Why is that? What made the change? 12:42PM

20 A. To streamline the process when a lot of the 12:42PM
21 information aligns with information that is requested 12:42PM
22 within the grant application. 12:42PM

23 Q. Okay. And then how do you receive the 12:42PM
24 strategic plan from the programs if it's not in the 12:42PM
25 portal? 12:42PM

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1 A. We do not receive the strategic plan. We
2 receive the summary.

3 Q. Uh-huh.

4 A. Mid-year and end-year summary. It's a one
5 pager.

6 Q. Mm-hmm.

7 A. And it is uploaded within the grant
8 application.

9 Q. Are you -- earlier when we spoke about the
10 strategic plan, I believe you said that there were
11 ratings of emerging, operational, and evident?

12 A. When we used to review the strategic plan and
13 go out and do the reviews and it was uploaded in the
14 portal, yes.

15 Q. And now when you receive the mid-year summary
16 and end-of-year summary?

17 A. They're rating themselves.

18 Q. And does GaDOE provide --

19 A. No.

20 Q. -- a rating?

21 A. No.

22 Q. And this happened in the last two years?

23 A. Mm-hmm.

24 Q. Do you -- does GaDOE provide any feedback
25 related to the mid-year summary or end of the year

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1 Q. Okay. Were these ratings tied to anything? 12:53PM

2 A. No. 12:53PM

3 Q. What would have happened if someone -- a 12:53PM
4 regional program had all emergings and not evident? 12:53PM

5 MS. JOHNSON: Objection. 12:53PM

6 THE WITNESS: I can't say because I've 12:53PM
7 never had that happen. 12:53PM

8 Q. BY MS. TUCKER: You never had that -- 12:53PM

9 A. Since I've been with the program. 12:53PM

10 Q. And you've been with the program the entire 12:53PM
11 time it's had the operational, emerging, and not evident 12:53PM
12 because before it was numerical? 12:53PM

13 A. Right. 12:53PM

14 Q. Do you and Vickie have conversations with the 12:54PM
15 regional GNETS program -- I know you said they're 12:54PM
16 uploaded into the portal, but afterwards about their 12:54PM
17 scores, ratings? 12:54PM

18 A. A lot of times a conversation was happening 12:54PM
19 within the review so -- 12:54PM

20 Q. Okay. 12:54PM

21 A. So there wasn't a lot of follow up needed. 12:54PM

22 MS. TUCKER: I'd like the Court Reporter to 12:54PM
23 mark this document as Plaintiff's Exhibit 427. 12:54PM

24 (Plaintiff's Exhibit 427 marked for 12:54PM
25 identification.) 12:54PM

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1 Q. BY MS. TUCKER: The Bates number on the first 12:54PM
2 page of the document is GA00960449. This is a 12:54PM
3 September 9th, 2020, e-mail from you to two e-mail 12:55PM
4 addresses with the domain at tcjackets.net, and Shawn 12:55PM
5 Owen and Vickie Cleveland and you were copied. 12:55PM

6 A. (Witness examining document.) 12:55PM

7 Q. The subject reads: "State suggested revision 12:55PM
8 on action items for Pathways Educational Program GNETS 12:55PM
9 strategic plan." 12:55PM

10 Dr. Stevenson, do you recognize this 12:55PM
11 e-mail? 12:55PM

12 A. This is a generated e-mail. It's not one I 12:55PM
13 typed. 12:55PM

14 Q. Oh. Can you explain that to me? 12:55PM

15 A. So in the portal, this is in 2020, so this was 12:55PM
16 a virtual review that took place cause by September, 12:55PM
17 that was COVID. 12:55PM

18 Q. Okay. 12:55PM

19 A. And the reviews were virtual. So once the 12:55PM
20 information is put in and I hit submit, she needed a 12:55PM
21 revision, and it automatically sends it. So it's not 12:55PM
22 something that -- it's not an e-mail I typed myself. 12:55PM

23 Q. I understand. So this happens when you put it 12:56PM
24 in other -- for other regional GNETS programs too? 12:56PM

25 A. So if they needed a revision on their strategic 12:56PM

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1 plan, it would say what section, what action item and 12:56PM
2 the finding. 12:56PM

3 Q. Okay. 12:56PM

4 A. But I didn't type the e-mail, no. It's auto 12:56PM
5 generated. 12:56PM

6 Q. Sure. Would the finding where it says "Section 12:56PM
7 action item finding,"-- excuse me, would you have typed 12:56PM
8 what's in after the finding into the portal and that 12:56PM
9 would have then -- 12:56PM

10 A. Yes. I just -- 12:56PM

11 Q. -- been -- 12:56PM

12 A. Yeah, that's it. 12:56PM

13 Q. Okay. So you, for example, for Section 2, 12:56PM
14 behavioral support and therapeutic services, your 12:56PM
15 finding was, and you wrote upload PBIS agendas, and 12:56PM
16 upload evidence of how red areas and self-assessments 12:56PM
17 were addressed? 12:56PM

18 A. Yes. 12:56PM

19 Q. Okay. What is meant by red areas? 12:56PM

20 A. So that means that the red area -- so the 12:56PM
21 self-assessment that I was talking about at the end of 12:56PM
22 the strategic plan review, if her areas were marked red, 12:56PM
23 they were areas of need, so how were you -- how was she 12:57PM
24 going to address those. 12:57PM

25 Q. And that would ultimately affect their rating? 12:57PM

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1 A. Well, I'm not sure if I gave them a rating if 12:57PM
2 they hadn't completely uploaded everything yet. 12:57PM

3 Q. I see Shawn Owen is copied. 12:57PM

4 A. Shawn is always copied on all auto-generated 12:57PM
5 because she's the deputy. 12:57PM

6 Q. Okay. 12:57PM

7 A. Anything that comes out of the portal to the -- 12:57PM
8 to any -- not just with GNETS, with anybody. 12:57PM

9 Q. So she's getting lots of e-mails? 12:57PM

10 A. Yes. 12:57PM

11 Q. Have you or Vickie ever discussed any 12:57PM
12 feedbacks -- feedback related to the GNETS strategic 12:57PM
13 plan with Shawn Owen? 12:57PM

14 A. Not that I can recall. Not that I've been 12:57PM
15 involved. 12:57PM

16 Q. Okay. And then what -- the domain was at 12:57PM
17 tcjackets.net. Do you know who this was sent to? 12:57PM

18 A. I believe -- that's Pathways. 12:58PM

19 Q. Pathways. Which is one of the 24 regional 12:58PM
20 GNETS? 12:58PM

21 A. Mm-hmm. 12:58PM

22 Q. Yes? 12:58PM

23 A. Yes. I'm sorry. 12:58PM

24 Q. And then -- so similar e-mails like this went 12:58PM
25 out to the other regional GNETS programs? 12:58PM

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1 A. Georgia Department -- GaDOE. 02:10PM

2 Q. Okay. You said you provide updates? 02:10PM

3 A. Mm-hmm. 02:10PM

4 Q. Updates on what? 02:10PM

5 A. Updates on changes that might be made to the 02:10PM

6 schedule for our monthly meetings or updates on due 02:10PM

7 dates for certain things or updates on webinars that are 02:10PM

8 going to be provided, not by us but by other people 02:10PM

9 outside on maybe special design instructions or things 02:10PM

10 like that. So just to make sure that they're aware of 02:10PM

11 those type of things that could be offered to them. 02:10PM

12 Q. Who sets the agenda for the monthly meetings? 02:10PM

13 A. Vickie usually, and myself. 02:10PM

14 Q. In consultation with you? 02:10PM

15 A. Mm-hmm. 02:10PM

16 Q. Are the agendas sent out in advance to the 02:10PM

17 regional GNETS programs? 02:10PM

18 A. No. 02:10PM

19 Q. I am going to introduce an exhibit that has 02:10PM

20 paper, but also there's going to be an electronic 02:10PM

21 component. 02:11PM

22 A. Okay. 02:11PM

23 MS. TUCKER: I'd like the Court Reporter to 02:11PM

24 mark this document as Plaintiff's Exhibit 429. 02:11PM

25 (Plaintiff's Exhibit 429 marked for 02:11PM

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1 identification.)

2 Q. BY MS. TUCKER: The Bates number on the bottom
3 of this documents reads, GA00956689. This is a
4 May 26th, 2020 e-mail from Vickie Cleveland to you. The
5 subject of the e-mail reads: "Draft responses." And
6 there is one attachment titled: "Copy of copy GNETS
7 director meeting questions, 2020-05-26."

8 A. (Witness examining document.)

9 Q. Dr. Stevenson, do you recognize this e-mail?

10 A. Yes.

11 Q. Yes?

12 A. Yes.

13 Q. Okay. We're going to turn to the attachment
14 which starts with GA00956690. But this is a
15 spreadsheet, so my colleague Megan Erickson is going to
16 share the screen and then you'll be able to access it.

17 THE VIDEOGRAPHER: And just let me know if
18 there's any issue with the screen share.

19 MS. TUCKER: I think it's about to happen.

20 Q. BY MS. TUCKER: Great. And then do you have
21 control over the document, Dr. Stevenson? I know you
22 see it.

23 A. Yes, I do.

24 Q. Okay. So you are able to manipulate and zoom
25 in and --

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1 A. Well, I can move the mouse. 02:12PM

2 Q. Okay. Are you able to zoom in? 02:12PM

3 THE VIDEOGRAPHER: Oh, you might have to 02:12PM

4 hit the plus sign or you can do this with your fingers 02:12PM

5 on the mouse pad. 02:13PM

6 THE WITNESS: Oh. 02:13PM

7 THE VIDEOGRAPHER: Do you want me to go off 02:13PM

8 the record? 02:13PM

9 MS. TUCKER: Yes, let's go off the record 02:13PM

10 just real quick. 02:13PM

11 THE VIDEOGRAPHER: All right. Off the 02:13PM

12 record at 2:14 p.m. 02:13PM

13 (Off the record at 2:14 p.m.) 02:13PM

14 THE VIDEOGRAPHER: Back on the record at 02:15PM

15 2:16 p.m. 02:15PM

16 Q. BY MS. TUCKER: Dr. Stevenson, are you now 02:15PM

17 looking at the spreadsheet that we identified as 02:15PM

18 GA0095690? 02:15PM

19 A. Yes. 02:15PM

20 Q. Okay. Do you recognize this spreadsheet? 02:15PM

21 A. Yes. 02:15PM

22 Q. Did you create it? 02:15PM

23 A. I created a form in Jotform -- 02:15PM

24 Q. Okay. 02:15PM

25 A. -- where the GNETS directors -- since we were 02:15PM

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1 going virtual.

02:15PM

2 Q. Okay.

02:15PM

3 A. This would give them an opportunity to have
4 their questions answered ahead of time so we can make
5 sure that they were addressed.

02:15PM

02:15PM

02:15PM

6 Q. Okay. What is Jotform?

02:15PM

7 A. Jotform is a platform you can use to create
8 documents and send out to people for various things, so
9 I just used that to create this. And then after -- and
10 then it will automatically put it on Excel, if you
11 request it.

02:16PM

02:16PM

02:16PM

02:16PM

02:16PM

12 Q. Got it. And is this a form that you created
13 that then the regional GNETS directors could add to it?

02:16PM

02:16PM

14 A. Well, I would -- the Jotform would just say,
15 "Questions for monthly directors meeting," and then I
16 would send the link out.

02:16PM

02:16PM

02:16PM

17 Q. Okay.

02:16PM

18 A. And then they would put whatever questions they
19 would have for the upcoming meeting, that they might
20 need answered, so we could make sure that they were
21 addressed.

02:16PM

02:16PM

02:16PM

02:16PM

22 Q. And is this practice of answering questions
23 in -- having questions to answer in advance, is that
24 standard practice for your GNETS meetings with the
25 regional directors?

02:16PM

02:16PM

02:16PM

02:16PM

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1 A. It's wasn't -- it's not necessarily standard
2 practice, but in other departments within GaDOE we've
3 seen that and how it ensured that everybody's questions
4 got answered, so we thought it would be a good practice
5 to try to start using.

6 Q. Are you currently using this practice?

7 A. We -- we've only had one meeting, two meetings,
8 this year and I haven't done a Jotform for the meeting
9 so far this year.

10 Q. Have regional GNETS directors reached out with
11 questions in advance of the monthly meetings separate
12 from the Jotform?

13 A. Sometimes they'll have questions just in
14 general, but there might be questions that we're going
15 to address at the meeting.

16 Q. So am I correct, looking at this spreadsheet,
17 there's text and black font?

18 A. Mm-hmm.

19 Q. Those are the questions that you put in, that
20 you received from the regional GNETS directors?

21 A. Those are the questions that they put in
22 themselves.

23 Q. Okay.

24 A. So I didn't put in any questions. I just sent
25 a link and they had to select, you know, question, and

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1 then what their question was in regards to, and then
2 they put their questions in there.

3 Q. Did they also identify the topic or did you
4 identify --

5 A. They had options to choose from for the topic.

6 Q. Okay. And now I see answers in red, red front?

7 A. Yes.

8 Q. Who wrote the red font?

9 A. Vickie.

10 Q. Vickie. Okay. And are these red font answers
11 something that you would share in advance of the meeting
12 or is this something that you would discuss at the
13 meeting?

14 A. These would be the answers Vickie would give
15 them at the meeting.

16 Q. Verbally?

17 A. Yes.

18 Q. Did Vickie ask you to create a spreadsheet like
19 this through Jotform?

20 A. No. Like I said, we just thought it would be a
21 good idea to make sure questions were being addressed.

22 Q. The last two meetings that you've had this
23 school year, you think one or two?

24 A. Mm-hmm.

25 Q. Did any regional GNETS directors send you